The Official Action rejects claims 85-99 as obvious based on the combination of JP 01-156725 to Matsueda and U.S. Patent No. 5,055,899 to Wakai. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims. Independent claim 85 recites, among other features, (1) a lead electrode electrically connected to one of the source or drain regions of a thin film transistor through a first hole of an interlayer insulating film, (2) a pixel electrode formed over an organic resin film, the pixel electrode being electrically connected to the lead electrode through a second hole of the organic resin film, and (3) a contact surface between the lead electrode and the one of the source and drain

region does not overlap with a contact surface between the lead electrode and the pixel electrode.

In other words, claim 85 recites that a lead electrode is electrically connected to one of the source or drain regions through a first hole of an insulating film, and a pixel electrode is electrically connected to the lead electrode through a second hole of an organic resin film where a contact surface between the lead electrode and the one of the source and drain region does not overlap with a contact surface between the lead electrode and the pixel electrode. The above-referenced features of claim 85 are advantageous in that an etching step to form one of the contact surfaces can be facilitated as compared with a case where both contact surfaces overlap. The advantages of the above-referenced features are explained as follows: The lead electrode naturally has a stepped portion due to the first hole of the first insulating film. Such a stepped portion makes it difficult to perform an etching process for forming a second hole in the second insulating film over the lead electrode if the second hole is intended to be formed over the first hole. However, it is possible to avoid such difficulty if the second hole is intentionally located so as not to overlap the first hole.

For the reasons provided below, Matsueda and Wakai, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.

The Official Action does not address the feature of a contact surface between a lead electrode and the one of the source and drain region does not overlap with a contact surface between the lead electrode and the pixel electrode. Rather, the Official Action generally asserts that "Matsueda shows two different contact holes (see at least Figures 2, 4)" (page 2, Paper No. 20060925). However, the contact holes shown in Figures 2 and 4 of Matsueda appear to be directed to a connection between a signal line and a thin film transistor (left side of the TFT in Figure 4) and a connection between a pixel electrode and the thin film transistor (right side of the TFT in Figure 4).

Specifically, Figure 2 of Matsueda appears to show two holes, that is, a first hole, which is for a connection between a data line 12 and a TFT 14 and a second hole, which is for a connection between a pixel electrode 11 and the TFT 14. Thus, the two contact holes are directed to two different connections. However, in claim 85 of the present application, both of the first and second holes are provided for an electrical connection between a pixel electrode and one of the source or drain regions. Also, in Figure 4, Matsueda shows an insulating film 46 which allegedly corresponds to the claimed insulating film and a second insulating film 52 which allegedly corresponds to the claimed organic resin film. However, it should be noted that the contact hole of the insulating film 46 and the contact hole of the insulating film 52 completely overlap. Therefore, Matsueda does not teach or suggest that a lead electrode is electrically connected to one of the source or drain regions through a first hole of an insulating film, and a pixel electrode is electrically connected to the lead electrode through a second hole of an organic resin film where a contact surface between the lead electrode and the one of the source and drain region does not overlap with a contact surface between the lead electrode and the pixel electrode.

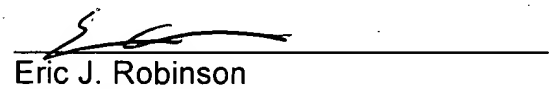
Wakai does not cure the deficiencies in Matsueda. The Official Action relies on Wakai to teach that it would have been obvious to incorporate a lead/first electrode into Matsueda (pages 2-3, Paper No. 20060925). However, Matsueda and Wakai, either alone or in combination, do not teach or suggest that a lead electrode is electrically connected to one of the source or drain regions through a first hole of an insulating film, and a pixel electrode is electrically connected to the lead electrode through a second hole of an organic resin film where a contact surface between the lead electrode and the one of the source and drain region does not overlap with a contact surface between the lead electrode and the pixel electrode.

Since Matsueda and Wakai do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration

and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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